UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF NORTH CAROLINA

Plaintiffs, V. Case No. 1:23-cv-861-TDS-JEP ALAN HIRSCH, in his official capacity as Chair of the State Board of Elections, et al., Defendants. DEMOCRATIC NATIONAL COMMITTEE, et al., Plaintiffs, V. Case No. 1:23-cv-861-TDS-JEP Case No. 1:23-cv-861-TDS-JEP ALAN HIRSCH, in his official capacity as Chair of the State Board of Elections, et al., Defendants.	VOTO LATINO, et al.,	
ALAN HIRSCH, in his official capacity as Chair of the State Board of Elections, et al., Defendants. DEMOCRATIC NATIONAL COMMITTEE, et al., Plaintiffs, v. ALAN HIRSCH, in his official capacity as Chair of the State Board of Elections, et al.,	Plaintiffs,	
Chair of the State Board of Elections, et al., Defendants. DEMOCRATIC NATIONAL COMMITTEE, et al., Plaintiffs, v. Case No. 1:23-cv-862-TDS-JEP ALAN HIRSCH, in his official capacity as Chair of the State Board of Elections, et al.,	v.	Case No. 1:23-cv-861-TDS-JEP
DEMOCRATIC NATIONAL COMMITTEE, et al., Plaintiffs, v. Case No. 1:23-cv-862-TDS-JEP ALAN HIRSCH, in his official capacity as Chair of the State Board of Elections, et al.,	, 1	
COMMITTEE, et al., Plaintiffs, v. Case No. 1:23-cv-862-TDS-JEP ALAN HIRSCH, in his official capacity as Chair of the State Board of Elections, et al.,	Defendants.	
V. Case No. 1:23-cv-862-TDS-JEP ALAN HIRSCH, in his official capacity as Chair of the State Board of Elections, et al.,		
ALAN HIRSCH, in his official capacity as Chair of the State Board of Elections, et al.,	Plaintiffs,	
Chair of the State Board of Elections, et al.,	V.	Case No. 1:23-cv-862-TDS-JEP
Defendants.		
	Defendants.	

JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT

All parties in *Voto Latino, et al v. Hirsch, et al.*, (Case No. 1:23-cv-861), and all parties in *Democratic National Committee, et al., v. Hirsch, et al.*, (Case No. 1:23-cv-862),

¹ The Parties in *Voto Latino* are as follows: (1) Plaintiffs, Voto Latino, the Watauga County Voting Rights Task Force, Down Home North Carolina, and Sophie Jae Mead; (2) the North Carolina State Board of Elections Defendants (Karen Brinson Bell, Alan Hirsch, Jeff Carmon, Stacy Eggers IV, Kevin Lewis, and Siobhan O'Duffy Millen); (3) the Watauga County Board Defendants (Michael Behrent, Eric Eller, Matt Walpole, Leta Councill, and Elaine Rothenberg); (4) the Legislative Intervenors (Philip E. Berger and Destin Hall); and (5) the RNC Intervenors (Republican National Committee, North Carolina Republican Party, Virginia A. Wasserberg, and Brenda M. Eldridge)

² The Parties in *Democratic National Committee* are as follows: (1) Plaintiffs, Democratic National Committee and North Carolina Democratic Party; (2) the North Carolina State Board of Elections

(hereinafter the "Joint Parties"), respectfully move the Court for entry of the attached Stipulation and Consent Judgment, Exhibit 1 to this Motion. The Joint Parties respectfully request that the Court sign and enter the Consent Judgment filed as Exhibit 1 as its final order and judgment in this case. Identical copies of this Motion and the Consent Judgment are being filed in both Nos. 1:23-cv-861 and 1:23-cv-862.

Respectfully submitted, this the 22nd day of April, 2025.

NORTH CAROLINA DEPARTMENT
OF JUSTICE

/s/ Terence Steed TERENCE STEED N.C. BAR NO. 52809 Post Office Box 629 RALEIGH, NC 27602 PHONE: (919) 716-6900 FAX: (919) 716-6763 TSTEED@NCDOJ.COM

Counsel for Defendants North Carolina State Board of Elections, Karen Brinson Bell, Alan Hirsch, Jeff Carmon, Stacy Eggers IV, Kevin N. Lewis, and Siobhan O'Duffy Millen in matters 1:23-cv-861 and 1:23-cv-862.

NELSON MULLINS RILEY & SCARBOROUGH LLP

/s/ Phillip J. Strach PHILLIP J. STRACH N.C. BAR No. 29456 ALYSSA M. RIGGINS N.C. BAR No. 52366 CASSIE A. HOLT N.C. Bar No. 56505

301 Hillsborough Street, Suite 1400

Raleigh, NC 27603 Phone: (919) 329-3800 Fax: (919) 329-3779

phil.strach@nelsonmullins.com alyssa.riggins@nelsonmullins.com cassie.holt@nelsonmullins.com

Counsel for Intervenors Philip E. Berger and Destin Hall in matters 1:23-cv-861 and 1:23-cv-862.

Defendants (Karen Brinson Bell, Alan Hirsch, Jeff Carmon, Stacy Eggers IV, Kevin Lewis, and Siobhan O'Duffy Millen); (3) the Legislative Intervenors (Philip E. Berger and Destin Hall); and (4) the RNC Intervenors (Republican National Committee, North Carolina Republican Party, Virginia A. Wasserberg, and Brenda M. Eldridge)

ELIAS LAW GROUP LLP

/s/ Aria C. Branch
ARIA C. BRANCH*
WILLIAM K. HANCOCK*
ELIAS LAW GROUP LLP
250 Mass. Ave. NW, Suite 400
Washington, D.C. 20001
Telephone: (202) 968-4490
abranch@elias.law
whancock@elias.law

*Special Appearance pursuant to Local Rule 83.1(d)

PATTERSON HARKAVY LLP

/s/ Narendra K. Ghosh
NARENDRA K. GHOSH
PAUL E. SMITH
PATTERSON HARKAVY LLP
100 EUROPA DR., SUITE 420
CHAPEL HILL, NC 27217
TELEPHONE: (919) 942-5200
NGHOSH@PATHLAW.COM
PSMITH@PATHLAW.COM

Counsel for Voto Latino, the Watauga County Voting Rights Task Force, Down Home North Carolina, and Sophie Jae Mead in matter 1:23-cv-861. CHALMERS, ADAMS, BACKER & KAUFMAN, PLLC

By:/s/ Philip R. Thomas
PHILIP R. THOMAS
N.C. BAR NO. 53751
204 N. Person St.
Raleigh, NC 27601
Telephone: 919-670-5185
Facsimile: 678-582-8910
pthomas@chalmersadams.com

BAKER & HOSTETLER LLP

TYLER G. DOYLE (PRO HAC VICE)
TEXAS STATE BAR NO. 24072075
RACHEL HOOPER (PRO HAC VICE)
TEXAS STATE BAR NO. 24039102
811 Main St., Suite 1100
Houston, Texas 77002
Telephone: 713-751-1600
Facsimile: 713-751-1717
tgdoyle@bakerlaw.com
rhooper@bakerlaw.com

TREVOR M. STANLEY (PRO HAC VICE)
DISTRICT OF COLUMBIA BAR NO. 991207
RICHARD RAILE (PRO HAC VICE)
DISTRICT OF COLUMBIA BAR NO. 1015689
Washington Square
1050 Connecticut Avenue NW, Suite 1100
Washington, DC 20036
Telephone: 202-861-1500
Facsimile: 202-861-1783
tstanley@bakerlaw.com
rraile@bakerlaw.com

Patrick T. Lewis (*pro hac vice*) Ohio State Bar No. 0078314 Key Tower 127 Public Square, Suite 2000 Cleveland, Ohio 44114 Telephone: 216-621-0200

Facsimile: 216-696-0740 plewis@bakerlaw.com

Counsel for Intervenors Republican National Committee, North Carolina Republican Party, Virginia A. Wasserberg, and Brenda M. Eldridge in matters 1:23cv-861 and 1:23-cv-862.

BROOKS, PIERCE, MCLENDON HUMPHREY & LEONARD, LLP

/s/ Shana L. Fulton
SHANA L. FULTON
N.C. BAR NO. 27836
WILLIAM A. ROBERTSON
N.C. BAR NO. 53589
JAMES W. WHALEN
N.C. Bar No. 58477
150 Fayetteville Street
1700 Wells Fargo Capitol Center
Raleigh, N.C. 27601
Phone: (919) 839-0300
sfulton@brookspierce.com
wrobertson@brookspierce.com
jwhalen@brookspierce.com

WILMER CUTLER PICKERING HALE AND DORR LLP

/s/ Seth P. Waxman
SETH P. WAXMAN*
DANIEL S. VOLCHOK*
CHRISTOPHER E. BABBITT*
GARY M. FOX*
JOSEPH M. MEYER*
2100 Pennsylvania Avenue N.W.
Washington, D.C. 20037
Phone: (202) 663-6000
seth.waxman@wilmerhale.com
daniel.volchok@wilmerhale.com
christopher.babbitt@wilmerhale.com
gary.fox@wilmerhale.com

WOMBLE BOND DICKINSON (US) LLP

/s/ Bradley O. Wood BRADLEY O. WOOD N.C. STATE BAR NO.: 22392 One West Fourth Street Winston-Salem, NC 27101 Telephone: (336) 728-7012 Facsimile: (336) 726-6913 E-mail: Brad.Wood@wbd-us.com

Counsel for Defendants Michael Behrent, Eric Eller, Leta Councill, Matt Walpole, and Elaine Rothenberg in matter 1:23-cv-861. joseph.meyer@wilmerhale.com
*Local Rule 83.1(d) special appearance

Counsel for Plaintiffs Democratic National Committee and North Carolina Democratic Party in matter 1:23-cv-862.

CERTIFICATE OF SERVICE

I hereby certify that I filed the forgoing document using the Court's CM/ECF System which will send notification to all counsel of record.

This the 22nd day of April, 2025.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By:/s/ Phillip J. Strach
Phillip J. Strach (NCSB # 29456)